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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THE DANIELS FAMILY 2001 REVOCABLE
TRUST, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

LAS VEGAS SANDS CORP., DR. MIRIAM
ADELSON, in her capacity as Special
Administrator of the estate of SHELDON
G. ADELSON, PATRICK DUMONT, and
ROBERT G. GOLDSTEIN,

Defendants.

Case No.: 2:20-cv-01958-CDS-EJY

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANTS TO
ANSWER SECOND AMENDED
COMPLAINT**

(FIRST REQUEST)

Defendants Las Vegas Sands Corp., Dr. Miriam Adelson, in her capacity as Special Administrator of the Estate of Sheldon G. Adelson, Patrick Dumont, and Robert G. Goldstein (collectively, “Defendants”), and Lead Plaintiffs Carl S. Ciaccio and Donald M. DeSalvo (collectively, “Plaintiffs,” and together with Defendants, “the Parties”) stipulate that the deadline

1 for Defendants to answer the Second Amended Complaint (“SAC”) is extended 90 days until
2 November 20, 2023. The Parties further state as follows:

3 1. On April 18, 2022, Plaintiffs filed the SAC. ECF No. 77. Defendants filed a
4 motion to dismiss the SAC on May 18, 2022. ECF No. 84.

5 2. On August 8, 2023, the Court issued an Order granting in part and denying in part
6 Defendants’ motion to dismiss the SAC, and allowing Plaintiffs until August 30, 2023, to file a
7 third amended complaint. ECF No. 108 (the “Order”).

8 3. Under Federal Rule of Civil Procedure 12(a)(4)(A), Defendants’ current deadline
9 to answer the SAC is August 22, 2023.

10 4. The SAC is 96 pages long and contains 382 paragraphs. Defendants state that due
11 to the length of the SAC, the number of statements challenged, the number of issues involved,
12 and the fact that one Individual Defendant is deceased, Defendants require additional time to
13 answer.

14 5. On August 22, 2023, Defendants filed a Motion for Partial Reconsideration, or for
15 an Order Certifying an Interlocutory Appeal (ECF No. 109, the “Motion for Reconsideration”),
16 which seeks reconsideration of the Order and, if granted in full, would result in dismissal of the
17 SAC in its entirety.

18 6. In addition, on August 22, 2023, Defendants filed the pending Motion for Stay
19 Pending Adjudication of Defendants’ Motion for Reconsideration (ECF No. 110, the “Motion for
20 Stay”). Defendants’ Motion for Stay seeks a stay of their deadline to answer and of all other
21 proceedings, including discovery.

22 7. Although Plaintiffs anticipate filing an opposition to Defendants’ Motion for
23 Reconsideration and Motion for Stay, the parties have agreed to an extension of 90 days for
24 Defendants’ deadline to answer the SAC.

25 8. Moreover, should Plaintiffs file a third amended complaint by the August 30,
26 2023 deadline set forth in the Court’s Order (ECF No. 108), that would moot Defendants’ need
27 to answer the SAC.
28

9. Accordingly, the undersigned counsel, subject to approval of the Court, have agreed and stipulated that Defendants' time to answer the SAC is extended 90 days until November 20, 2023.

10. This stipulation is made without prejudice to Defendants' argument, as set forth in their Motion to Stay, that their time to answer, and all other proceedings including discovery, should not proceed in light of Defendants' Motion for Reconsideration.

For the foregoing reasons, the Parties respectfully request that the Court enter an order extending Defendants' deadline to answer Plaintiffs' Second Amended Complaint 90 days to November 20, 2023.

Dated: August 22, 2023

ALDRICH LAW FIRM, LTD.

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By: /s/ Shannon L. Hopkins

By: /s/ Patrick Byrne

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Attorneys for Defendants

~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED that the parties' stipulation is GRANTED. The deadline for Defendants to answer Plaintiffs' Second Amended Complaint is hereby extended 90 days to November 20, 2023.

IT IS SO ORDERED.

DATED: August 23, 2023


UNITED STATES MAGISTRATE JUDGE

4874-4015-8586